

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA, *ex rel.*  
KUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC., et. al.,

Defendants.

No. 2:21-cv-00410-KKE

STIPULATED MOTION AND ORDER  
TO EXTEND TIME TO RESPOND TO  
SECOND AMENDED COMPLAINT  
AND INITIAL CASE DEADLINES

NOTE ON MOTION CALENDAR:  
September 5, 2024

Plaintiff Kushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”) (collectively, “the Parties”), by and through their counsel of record, respectfully submit this Stipulation, and respectfully request that the Court enter the proposed order extending the time for Defendant to respond to the Second Amended Complaint (“SAC”).

1. On August 1, 2024, pursuant to Fed. R. Civ. P. 15(a)(2) and LCR 15(b), and as stipulated by the Parties, Plaintiff filed the SAC. In the SAC, Plaintiff amended his retaliation causes of action against Aledade, Inc, and removed all Federal False Claims Act (“FCA”) causes of action asserted in the First Amended Complaint against all defendants, including Aledade.

2. On August 2, 2024, the Court set Initial Scheduling Dates. (Dkt. No. 44) (“the Order Setting Initial Scheduling Dates”).

STIPULATED MOTION AND ORDER  
TO EXTEND TIME TO RESPOND- 1  
(No. 2:21-cv-00410-KKE)

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1           3.       On August 13, 2024, the Court granted the Parties' Stipulated Motion of Voluntary  
2 Dismissal and all FCA causes of action were dismissed. (Dkt. No. 46).

3           4.       Defendant's deadline to respond to Plaintiff's SAC is September 6, 2024. (Dkt.  
4 No. 41).

5           5.       On August 23, 2024, pursuant to the Order Setting Initial Scheduling Dates, the  
6 Parties met and conferred.

7           6.       The Parties are currently discussing the potential for resolution of this matter.

8           7.       An extension would further judicial economy, and no party will be prejudiced by  
9 an extension.

10          8.       Based on the foregoing and to facilitate these discussions, the Parties jointly request  
11 that the Court extend the deadline for Defendant to answer or otherwise respond to the SAC for  
12 one month until October 4, 2024.

13          9.       The Parties also jointly request an extension of the Initial Scheduling Dates as  
14 follows:

15               i.     Initial Disclosures Pursuant to FRCP 26(a)(1) due October 4, 2024

16               ii.    Combined Joint Status Report and Discovery Plan due October 11, 2024

17          10.      The Parties intend to also submit this joint request for extension via email to the  
18 Courtroom Deputy as required under the Order Setting Scheduling Dates.

19          11.      A proposed order is subjoined herewith.

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DATED this 5th day of September, 2024. I certify that this document contains 322 words,  
in compliance with the Local Civil Rules.

TELLER LAW

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s/ Stephen Teller

s/ Jeffrey B. Coopersmith

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*Attorneys for Defendant Aledade, Inc.*

ORDER

IT IS SO ORDERED.

DATED this 6th day of September, 2024.



Kymerly K. Evanson  
United States District Judge